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April 25, 2023

*Via ECF & email (chambersnysdseibel@nysd.uscourts.gov)*  
Hon. Cathy Seibel, United States District Court Judge  
United States District Court, Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601

Re: *A.S. etc. v. Mamaroneck Union Free School District, et al.*, Civil Action No. 21-CIV-6937 (CS)  
Request for extension of time.

Dear Judge Seibel:

This office represents the defendant Mamaroneck Union Free School District (“District”) in this action commenced by the Plaintiff Parent A.S. on behalf of her minor son, A.B. With the consent of counsel for the Plaintiff, we are requesting that the Court extend the parties’ time to complete their submissions on their cross-motions for summary judgment in this action.

As per a previously established summary judgment cross-motions schedule, the District has served (but not filed) its motion for summary judgment and the Plaintiff has served (but not filed) her answering papers and cross-motion for summary judgment. Under the aforesaid schedule, the District’s reply and answering papers would be due for service (but not filing) by May 8, 2023 and the Plaintiff’s reply papers on her cross-motion for summary judgment would be due for service by May 22, 2023, at which time all motion papers and answering papers would be ECF filed with the Court for full submission.

As I have four summary judgment motions due in May of 2023 in New York State law Child Victim Act cases on behalf of our school district clients and will soon commence a brief vacation that will end on May 8, 2023, I requested of Plaintiff's counsel their consent to a request that the Court extend our time to serve (but not file) our answering/reply papers on the cross-motions for summary judgment to June 8, 2023 and extend the Plaintiff's time to serve her reply papers on her cross-motion for summary judgment to June 22, 2023, at which time all the motion papers and answering papers would be ECF filed with the Court for full submission. Plaintiff's counsel has graciously consented to this request.

This is the first request made for the relief requested herein.

Thank you for your anticipated consideration of this request.

Respectfully submitted,

SHAW, PERELSON, MAY & LAMBERT, LLP

BY:                     /S/                      
MARK C. RUSHFIELD, ESQ.

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